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XRP II LLC, and Bradley Garlinghouse*

*Counsel for Lead Plaintiff Bradley Sostack*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

In re RIPPLE LABS INC. LITIGATION.

Case No. 18-cv-06753-PJH

**STIPULATION REGARDING  
REVISED STIPULATED  
[PROPOSED] PROTECTIVE ORDER**

**This Document Relates To:**

## ALL ACTIONS

Lead Plaintiff Bradley Sostack and Defendants Ripple Labs, Inc., XRP II LLC, and Bradley Garlinghouse (collectively, the “Parties”), by and through their respective counsel, agree and request as follows:

WHEREAS, on November 4, 2020, the Court entered the Stipulated Protective Order as  
Modified by the Court, ECF No. 120;

WHEREAS, the parties are seeking or may seek discovery in this action from third-parties who produced documents in connection with proceedings in *SEC v. Ripple Labs*, Case No. 20-cv-10832 (AT);

WHEREAS, in order to facilitate third-party discovery in this case in an efficient manner that will reduce burdens on third-parties to re-produce documents already subject to production in *SEC v. Ripple Labs*, the Parties have agreed on a revision to the definition of “Designating Party” in section 2.D of the Protective Order;

WHEREAS, the Parties have included the agreed-upon Revised Stipulated [Proposed] Protective Order as **Exhibit A** and a redline version showing the changes in section 2.D as **Exhibit B;**

NOW, THEREFORE, the Parties, through their respective counsel hereby stipulate and agree and request the Court order as follows:

1. Grant the Parties' request to modify the Protective Order and enter the Revised Stipulated [Proposed] Protective Order attached as Exhibit A as the operative Protective Order in the case.

IT IS SO STIPULATED.

Respectfully submitted,

Dated: August 6, 2021

By: /s/ James Taylor-Copeland  
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2                   **ATTESTATION**  
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4                   Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the  
5 filing of this document has been obtained from the other signatories.  
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7                   DATED:       August 6, 2021  
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9                                    /s/ Suzanne E. Nero  
10                                    Suzanne E. Nero  
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12                           **[PROPOSED] ORDER**  
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14                   Pursuant to the foregoing stipulation, IT IS SO ORDERED.  
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16                   Dated:  
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18                                    \_\_\_\_\_  
19                                    The Honorable Phyllis J. Hamilton  
20                                    United States District Judge  
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